



One South Wacker, Suite 200
Chicago, IL 60606
phone 312.384.8000
fax 312.346.3276

October 11, 2007

Hon. Deborah Taylor Tate
Commissioner
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: WC Docket No. 06-159

Dear Commissioner Tate:

I saw your statement at the Summit on Communications Network Surge Management in Emergencies on September 25, 2007. Thank you for continuing to bring these important network reliability issues to the forefront at the Federal Communications Commission (FCC).

As you may recall, when we met on March 5th of this year with you and Ian Dillner, I shared with you research we had compiled on these network surges during emergencies. We discussed how, as observed in the FCC's Report on Hurricane Katrina and in the New York Public Service Commission's Report on the Northeast Power Outage, tandems can act as a bottleneck during surges in calling. This threat is becoming ever more pressing to the Nation as the percentage of the aggregate voice traffic handled by non-traditional carriers, including wireless and cable providers, continues to increase. Neutral Tandem has been found to reduce the risk of such a tandem bottleneck by increasing tandem capacity and adding route diversity in the termination of tandem switched traffic.

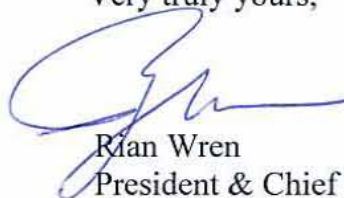
Our petition in the above docket asks whether it is "necessary or convenient in the public interest," as contemplated by Section 201(a) of the Communications Act, to require a wireless carrier to allow a connection to its switches for the termination of traffic from a competitive tandem switch, at no expense to the wireless carrier. The concerns you identified in your statement on September 25 and in your earlier testimony to the Senate Commerce Committee on February 1, 2007 bear directly on this question. Due to the importance of telecommunications survivability to government agencies, our petition has been supported by numerous governmental entities, such as the City of Chicago, the City of New York, and the State of New York Department of Public Service. It has also been supported by many telecommunications carriers, including AT&T.

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We would greatly appreciate your support in encouraging the Chairman to bring this matter before the full Commission quickly for a decision. It has been seven months since we last met on this and the petition remains pending. The Nation's homeland security is at stake, and it can rapidly be improved—at no cost to the public--by granting our petition.

Thank you for your attention, and we would welcome the opportunity to brief you further on this issue at any time.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Rian Wren", written over a horizontal line.

Rian Wren
President & Chief Executive Officer

cc: Ian Dillner
Marlene H. Dortch, Secretary, FCC